

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**STIPULATION AND ORDER FOR SUBSTITUTION OF COUNSEL**

This stipulation (the “Stipulation”) is entered by and between undersigned counsel pursuant to Rule 2090-1(e) of the Local Rules for the United States Bankruptcy Court for the Southern District of New York.

**WHEREAS**, Helen Davis Chaitman of Becker & Poliakoff LLP represents Edward Zraick Jr., Nancy Zraick, Patricia DeLuca and Karen M. Rich (collectively, the “Claimants”) in connection with their customer claims filed in the above-captioned SIPA proceeding;

**WHEREAS**, Peter S. Partee, Sr. and Robert A. Rich of Hunton & Williams LLP represent the Claimants in connection with the adversary proceeding filed by Irving H. Picard, as Trustee, against the Claimants, captioned Irving H. Picard, Trustee v. Edward A. Zraick, et al., Adv. Pro. No. 10-05257 (SMB);

**WHEREAS**, the Claimants believe that there exist common issues in both the SIPA proceeding and the adversary proceeding such that it would be more efficient to have Hunton & Williams LLP represent the Claimants in both cases;

**NOW THEREFORE**, the undersigned counsel hereby stipulate and agree as follows:

1. Hunton & Williams LLP, 200 Park Avenue, New York, New York 10166 shall be substituted for Becker & Poliakoff LLP, 45 Broadway, New York, New York 10006, as counsel of record for the Claimants in the above-captioned proceeding.

2. This Stipulation may be executed in any number of counterparts, each of which shall, when executed, be deemed to be an original and all of which together shall be one and the same instrument. Facsimile or electronic signatures on this Stipulation shall be deemed the same as originals.

Dated: New York, New York  
May 1, 2014

**HUNTON & WILLIAMS LLP**

/s/ Robert A. Rich

Peter S. Partee, Sr.  
Robert A. Rich  
200 Park Avenue, 53rd Floor  
New York, New York 10166-0136  
(212) 309-1000

**BECKER & POLIAKOFF LLP**

/s/ Helen Davis Chaitman

Helen Davis Chaitman  
45 Broadway  
New York, New York 10006  
(212) 599-3322

**SO ORDERED** this 6<sup>th</sup> day of May, 2014

/s/ STUART M. BERNSTEIN  
THE HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE